

REVISION PROCEEDINGS BEFORE THE INTERNATIONAL CRIMINAL COURT AND HYBRID COURTS

Muratova Elizabetta Yusufovna – Candidate of Legal Sciences, Associate Professor at the Department of Law, Higher School of Engineering and Social Sciences. Elabuga Institute (Branch) of the Federal State Autonomous Educational Institution of Higher Education "Kazan (Volga Region) Federal University" (Republic of Tatarstan, Elabuga, Kazanskaya Street, 89). E-mail: renatova.elizabetta@mail.ru Tel.: +7 917 399 16 18

Ziganshin Rashit Zashitovich – Postgraduate Student at the Department of Constitutional and International Law. Higher Education Institution "University of Management 'TISBI'" (Republic of Tatarstan, Kazan, Mushtari Street, 13; Mushtari Street, 11/43). E-mail: rashikz@rambler.ru Tel.: +7 925 080 00 02

Abstract. This article presents a comprehensive analysis of the institution of revision proceedings before international criminal tribunals and the International Criminal Court (ICC). Employing a comparative legal method, the study examines the normative foundations (charters, statutes, rules of procedure and evidence) and judicial practice concerning the revision of final judicial decisions. Significant discrepancies are identified in the legislative formulation of grounds for reopening a case, particularly regarding the interpretation of the concepts "new fact" and "new evidence," as well as differences in the procedural status of entities authorized to initiate revision. The article substantiates the problematic nature of the absence of a mandatory obligation for the Prosecutor to disclose newly discovered exculpatory evidence after a judgment has become final and to initiate revision in the interests of the convicted person. Issues pertaining to the realization of participants' procedural rights at the revision stage are addressed, including the presence of the convicted person at hearings and the participation of victims. Based on the research findings, measures are proposed to improve the regulation of revision proceedings, aimed at ensuring the timely submission of evidence, introducing flexibility in the initial consideration of applications, and guaranteeing the publicity and adversarial character of the procedure.

Keywords: international criminal law, International Criminal Court, international tribunals, revision proceedings, revision of judgment, new evidence, ICC Statute, rights of the convicted person, Appeals Chamber, judicial practice.

In the practice of international and "hybrid" courts (including "hybrid tribunals" and "internationalized courts") [1], provision is made for the revision of judgments under certain circumstances when new evidence or facts emerge. However, the scope and procedures governing such revision differ significantly across various courts and tribunals [2].

Judgment revision was expressly prohibited by the Nuremberg and Tokyo International Military Tribunals (hereinafter IMT and IMTFE). Nevertheless, a non-judicial mechanism was established: the Control Council (or the Supreme Commander of the Allied Powers in the case of the Tokyo Tribunal) "may at any time reduce or otherwise alter the sentence, but may not increase it" (Article 29 of the IMT Charter; Article 17 of the IMTFE Charter) [3].

The Statute of the International Criminal Tribunal for the former Yugoslavia (hereinafter ICTY) established a revision system independent from the appellate process. Article 26 of the Statute states: "If a new fact has been discovered which was not known at the time of the proceedings before the Trial Chambers or the Appeals Chamber and which could have been a decisive factor in reaching the decision, the convicted person or the Prosecutor may submit an application to the International Tribunal for review of the judgment" [4].

Similar provisions were enshrined in the statutes of the International Criminal Tribunal for Rwanda (hereinafter ICTR) (Article 25) [5], the Special Court for Sierra Leone (hereinafter SCSL) (Article 21) [6], the International Criminal Court (hereinafter ICC) (Article 84), and other tribunals. Revision "is generally regarded as an extraordinary remedy that is rarely successfully invoked" [7]. Although applications were filed in several cases before the ICTY, ICTR, the International Residual Mechanism for Criminal Tribunals (hereinafter IRMCT), and other tribunals, only three cases proceeded to substantive consideration: Prosecutor v. Šljivančanin (ICTY) [8], Prosecutor v. Jean Bosco Barayagwiza (ICTR) [9], and Prosecutor v. Augustin Ndirabatware (IRMCT) [10]. In examining these applications, a significant portion of the proceedings focused on clarifying the distinction between appeal and revision (particularly when revision applications were submitted during pending appeals), as well as on attempts to define the concept of a "new fact" [11].

Article 84 of the ICC Statute adopted what is perhaps a simpler "revision" system, which has not yet been applied in practice. Revision may be requested only with respect to a final decision, meaning that all appellate rights must have been exhausted [12].

Furthermore, the statutes of the ad hoc tribunals provide that an application for revision may be filed within one year from the date of the final judgment by either the convicted person or the Prosecutor, implying that even acquittals are subject to revision. In contrast, the ICC Statute stipulates that an application for revision may be submitted only concerning a final conviction, not an acquittal. This approach reflects the position of the International Law Commission, which considered that revising an acquittal would violate the principle of *ne bis in idem* [13]. Notably, the right to file a revision application before the ICC is not limited to the convicted person alone. If the convicted person has died, their "spouse, children, parents, or a person who, at the time of the accused's death, had received clear written instructions from the accused to file such an application" (Article 84(1) of the ICC Statute) may submit a request for revision. This contrasts with the practice of the ICTY, which rejected at least one application filed by a close relative and counsel of a deceased person due to their lack of procedural standing [14]. Moreover, while the ICC Prosecutor cannot petition for the revision of an acquittal, they may request the revision of a conviction on behalf of the convicted person.

The ability for various participants in the proceedings to initiate the revision of a verdict is undoubtedly a crucial mechanism enabling the International Criminal Court (ICC) to rectify judicial errors under diverse circumstances. Nevertheless, this system contains a significant omission: the ICC Prosecutor is not obligated to initiate revision *sua sponte*, even when new evidence exonerating the convicted person comes into their possession.

In practice, this creates an imbalance. There are instances where, following a final judgment, the convicted person or their relatives lack the resources to continue investigations. Meanwhile, the Prosecution, working on other cases within the same conflict context, is more likely to uncover new exculpatory information. In such situations, it is logical to require the Office of the Prosecutor to at least disclose such data to the defense. This would empower the convicted person and their representatives to independently decide how to utilize this information for case revision.

Furthermore, it should be noted that although the provision mandating the prompt disclosure by the Prosecutor of evidence indicating the innocence of the accused, or circumstances mitigating guilt or sentence (Article 67(2) of the ICC Statute), is located in Part 6 ("The Trial") of the Statute, it can and should be interpreted as imposing an ongoing obligation on the Prosecutor to disclose newly discovered exculpatory evidence to the convicted person even after judgment has been rendered. Such disclosure is essential to enable the use of this evidence in appeal and revision proceedings. If the convicted person or their representatives are unable to file for revision, or choose not to do so, the ICC Prosecutor is obliged to request revision on behalf of the convicted person, in accordance with their duty to act independently, impartially, and objectively.

The grounds for judgment revision in the ad hoc tribunals differ significantly from those in the ICC. The statutes and Rules of Procedure and Evidence (hereinafter RPE) of the tribunals establish four requirements for revision: (1) a new fact has been discovered; (2) the fact was unknown during the proceedings; (3) the lack of knowledge was not due to a lack of due diligence; and (4) the fact could have been a decisive factor in reaching the decision.

In practice, however, the ICTY and ICTR encountered difficulties in defining what constitutes a "new fact" [15]. The tribunals sought to draw a "clear distinction" between a new fact—defined as "a fact which was not in issue or considered during the original proceedings"—and additional evidence "relating to a fact which was in issue or considered during the original proceedings, but for which evidence was unavailable at that time" [16]. Several applications were rejected because the newly discovered evidence pertained to facts already examined during the initial trial or appeal, rather than constituting new facts [17].

Nevertheless, an analysis of case law demonstrates that judicial chambers frequently qualify certain circumstances as newly discovered, even when the evidentiary basis suggests identity with issues previously resolved during the main trial or appellate review. The case of *Prosecutor v. Veselin Šljivančanin* is illustrative in this context. In these proceedings, the Appeals Chamber initiated a revision procedure regarding its own verdict, which had affirmed the defendant's guilt for aiding and abetting the killing of 194 prisoners. The court's initial legal position was based on the finding that the accused, being aware of the withdrawal of troops providing security, realized the inevitability of lethal consequences resulting from his inaction [18]. The basis for revising the judicial act was an application supported by the testimony of a newly identified witness. The key factor was the confirmation that the accused had not been notified about the troop deployment, which substantially transformed the previously established factual picture [19].

Even though the new evidence clearly contradicted circumstances already accounted for in the conviction, the Appeals Chamber adopted a different stance. The Court recognized the information provided by the accused as a fully-fledged "new fact." In doing so, it emphasized that this information had the capacity to radically alter the entire evidentiary basis of the case [20].

The inconsistent approaches of the ICTY and ICTR regarding the application of the "new fact" criterion highlight the conceptual problematic nature of this test. Attempts in specific precedents to draw a clear demarcation between "new facts" and "new evidence" indicate that judges are aware of the risk of miscarriage of justice arising from rejecting information that refutes the fundamental grounds of the original verdict. While the desire to avoid judicial error is commendable, the lack of a unified and convincing legal framework within the tribunals to justify case revision under such circumstances remains a cause for concern.

In this context, the position of international courts allowing for judgment revision even when certain procedural conditions are not met becomes particularly significant. Specifically, this refers to the requirements that the fact was unknown during the main proceedings and could not have been discovered through the exercise of due diligence. In their decisions, the tribunals have interpreted these conditions as recommendatory rather than imperative, substantially transforming the traditional understanding of the grounds for revising judicial acts.

Unlike the single ground for revision applied by the ad hoc tribunals—the discovery of a "new fact"—revision of a judgment before the ICC may be conducted on three distinct grounds:

Discovery of new evidence, which:

(i) was not available at the time of trial, and whose unavailability cannot be attributed wholly or partly to the party making the application; and

(ii) is sufficiently important that, had it been presented at trial, it would likely have resulted in a different verdict.

Discovery of new facts demonstrating that decisive evidence taken into account during the trial and upon which the conviction depends was false, forged, or falsified.

Serious misconduct or breach of duty by one or more judges who participated in the conviction, of such gravity as to justify their removal from office pursuant to Article 46 [21].

Upon submission of an application for revision, the Court notifies the parties to the proceedings and affords them an opportunity to submit their observations. Most international and "hybrid" criminal courts and tribunals then conduct a preliminary examination to determine whether grounds for revision exist. In the ICTY and ICTR, such preliminary examinations were conducted by either the Trial Chamber or the Appeals Chamber (Rule 119(A) of the ICTY RPE; Rule 120(A) of the ICTR RPE). In contrast, at the ICC, applications are examined exclusively by the Appeals Chamber (Article 84(2) of the ICC Statute). If the Court concludes that the application is unfounded, it is rejected. If arguments worthy of consideration are identified, the case is referred for full revision.

Regrettably, the ICC's legal framework does not further define the scope of review required to determine whether an application is "unfounded" or "worthy of consideration" [22].

One commentary on the ICC Statute asserts: "The use of the terms 'unfounded' and 'worthy of consideration' suggests that the first step involves an assessment of whether the criteria are indeed met. This goes beyond a prima facie assessment" [23]. However, the process would likely be unfair if something more than a prima facie determination on the merits of the application were required at this initial stage of the revision procedure. At this stage, the ICC Appeals Chamber will have only the application and brief submissions from the parties; the convicted person will not be present, no hearings will be held, and no new evidence will be examined [24].

In the ad hoc tribunals, decisions on this issue did not require written justification. In contrast, the ICC enshrined in Rule 159 of its Rules of Procedure and Evidence (RPE) the necessity to provide reasoned decisions following the preliminary examination of an application. If the application is admitted, the ICC Appeals Chamber may reconvene the original Trial Chamber, constitute a new Trial Chamber, or retain jurisdiction over the matter itself.

Revision procedures remain vaguely defined in the statutes and RPE of international criminal courts and tribunals. The rules of the ICTY, ICTR, IRMCT, and other tribunals contain only a modest provision stating that the Chamber "shall review the judgment and render a new judgment after hearing the parties" (Rule 120 of the ICTY RPE; Rule 121 of the ICTR RPE; Rule 147 of the IRMCT RPE). The ICC Statute provides that, after hearing the parties in the manner established by the RPE, the relevant Chamber shall decide whether to revise the judgment.

The uniqueness of the ICC's Rules of Procedure and Evidence lies in the fact that it is the only instrument explicitly establishing the possibility of the convicted person's participation in revision hearings. Pursuant to Rule 160, the Chamber is obligated to order a hearing in advance. This is necessary to allow sufficient time, where conditions permit, to arrange for the transfer of the convicted person to the Court's seat. Furthermore, Rule 161(2) mandates that the provisions governing the trial (Part 6 of the ICC Statute) shall apply *mutatis mutandis*. These provisions, with rare exceptions, require the mandatory presence of the accused.

Given the convicted person's vested interest in the revision procedure, as well as the potential benefit of their personal presence for substantiating the application and examining witnesses, it is advisable to ensure their attendance at all such hearings, insofar as technically and legally feasible. Regarding victims, neither the ICC Statute nor its Rules contain explicit directives on their participation in revision

proceedings. Nevertheless, since the final decision may affect their personal interests, including issues of reparations, it is prudent to inform them of the proceedings and afford them an opportunity to participate, including through legal representatives.

The specific nature of the evidentiary basis characteristic of most grounds for revision necessitates that the applicant has the right to summon witnesses to support their position. Such witnesses must be available for cross-examination by other participants and the Court. The right of the applicant or their representatives to examine witnesses during ICC revision proceedings is further confirmed by Rule 161(2) [25].

While the acts of the ad hoc tribunals contain no provisions regarding the summoning of witnesses during revision, this clearly falls within the Chamber's discretionary powers [26]. For instance, the IRMCT permitted witnesses, including expert witnesses, to testify at the revision hearings in the Ngirabatware case [27].

Finally, whereas the statutes and RPE of most international criminal courts and tribunals lack requirements for the procedure of adopting a revised decision, the ICC Statute and RPE stipulate that such a decision "shall be taken by a majority of the judges and shall be delivered in open court. The decision shall state the reasons on which it is based. In the event of disagreement, the decision shall contain the views of the majority and the minority, but a judge may deliver a separate or dissenting opinion on a question of law" (Article 83(4) of the Statute; Rule 161(3) of the RPE) [28].

In light of the foregoing, we arrive at the following conclusions:

A gap has been identified in the legal regulation of criteria for revising final judgments of the International Criminal Court and hybrid courts. The Prosecutor, possessing comprehensive informational resources, may uncover new evidence of innocence while investigating related cases concerning a person already convicted. In such instances, to fulfill the Prosecutor's duty to act independently, impartially, and in the interests of justice, it would be advisable to mandate the immediate disclosure of such evidence to the convicted person. Disclosing exculpatory evidence obtained in other proceedings serves the supreme goal of international criminal justice: preventing the conviction of the innocent.

Flexibility is required in the interpretation and application of the test under Article 84 of the ICC Statute during the preliminary examination of revision applications based on new evidence. The Appeals Chamber must ensure that a full revision process is initiated whenever a risk of miscarriage of justice is identified.

It is timely to develop Rules and regulations governing the conduct of full revision proceedings, ensuring the following conditions: first, revision hearings must be public, subject to protective measures for victims and witnesses; second, the convicted person (where feasible) and their counsel must be present at revision hearings; victims should be permitted to participate in the revision process, including through legal representatives, to present their views; third, the decision must be published, and explanatory work should be conducted to clarify the ruling to the parties; fourth, a judgment must not be revised to the detriment of the convicted person.

References

1. Efremova, R. I. Mixed Criminal Jurisdiction in International Law. Abstract of PhD diss. in Law. Kazan, 2019, p. 4.
2. An International Bar Association International Criminal Court & International Criminal Law Programme report: Remedying Injustice: Appeals, Retrials and Revisions of Judgments in International Criminal Law. IBA ICL Perspectives [Online]. Available at: <https://www.ibanet.org/document?id=January-2011-Enhancing-Efficiency-and-Effectiveness> (Accessed: 24.02.2026).
3. Charter of the International Military Tribunal. In: Collection of Current Treaties, Agreements and Conventions Concluded by the USSR with Foreign States. Moscow: Politizdat, 1955, No. 11, pp. 166–183; Charter of the International Military Tribunal for the Far East (Tokyo, January 19, 1946). Garant [Online]. Available at: <https://base.garant.ru/2540693/> (Accessed: 24.02.2026).
4. Updated Statute of the International Criminal Tribunal for the former Yugoslavia. ICC [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: https://www.icty.org/x/file/Legal%20Library/Statute/statute_sept09_en.pdf (Accessed: 19.02.2026).
5. International Criminal Law in Documents: A Textbook. In 2 vols. Vol. 2. Comp. by R. M. Valeev, I. A. Tarkhanov, A. R. Kayumova. 2nd ed., rev. and enl. Moscow: Statut, 2010, p. 230.
6. Statute of the Special Court for Sierra Leone. SCSL [Online]. Official website of the Special Court for Sierra Leone. Available at: <http://www.rscsl.org/Documents/scsl-statute.pdf> (Accessed: 18.02.2026).
7. Williams, Sarah. Review of: The International Criminal Court and National Courts: a Contentious Relationship by Nidal Nabil Jurdi [2012]. Melbourne Journal of International Law, 2012, vol. 13(1), p. 274 [Online]. Available at: <http://www.rscsl.org/Documents/scsl-statute.pdf> (Accessed: 20.02.2026).
8. Prosecutor v. Veselin Šljivančanin. ICTY, Appeals Chamber. Decision with respect to Veselin Šljivančanin's application for review, Case No. IT-95-13/1-R.1, 14.07.2010 [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: <https://www.icty.org/x/cases/mrksic/acdec/en/100714.pdf> (Accessed: 19.02.2026).
9. Prosecutor v. Jean Bosco Barayagwiza. ICTR, Appeals Chamber. Decision (Prosecutor's request for review or reconsideration), Case No. ICTR-97-19-AR72, 31.03.2000 [Online]. Official website of the International Criminal Tribunal for Rwanda. Available at: <https://cld.irmct.org/assets/Uploads/full-text-dec/2000/00-03-31%20Barayagwiza%20Decision%20on%20Review.pdf> (Accessed: 19.02.2026).
10. Prosecutor v. Augustin Ngirabatware. MICT, Appeals Chamber. Decision, Case No. MICT-12-29-R, 19.06.2017 [Online]. Official website of the International Residual Mechanism for Criminal Tribunals. Available at: <https://cld.irmct.org/assets/filings/Ngirabatware-Division-on-Ngirabatwares-Motion-for-Review-Public-Redacted.pdf> (Accessed: 19.02.2026).
11. International Criminal Tribunal for the Former Yugoslavia: Prosecutor v. Šljivančanin. Published online by Cambridge University Press: 27 February 2017 [Online]. Available at: <https://www.cambridge.org/core/journals/international-legal-materials/article/abs/international-criminal-tribunal-for-the-former-yugoslavia-prosecutor-v-sljivancanin/8FE65DF92D9DE1AA28F0751285FA5AED> (Accessed: 19.02.2026).
12. Rome Statute of the International Criminal Court. ICC-PIOS-LT-03-002/15_Eng [Online]. Official website of the International Criminal Court. Available at: <https://www.icc-cpi.int/Publications/Rome-Statute.pdf> (Accessed: 19.02.2026).
13. Draft Statute for an International Criminal Court with commentaries 1994 [Online]. Official website of the United Nations. Available at: https://legal.un.org/ilc/texts/instruments/english/commentaries/7_4_1994.pdf (Accessed: 21.02.2026).
14. The Prosecutor v. Rasim Delić. ICTY, Appeals Chamber. Decision on motion for continuation of the appellate proceedings, Case No. IT-04-83-A [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: <https://www.icty.org/x/cases/delic/acdec/en/100629.pdf> (Accessed: 24.02.2026).
15. The Prosecutor v. Hazim Delić. ICTY, Appeals Chamber. Decision on Motion for Review, Case No. IT-96-21-R-1119 [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: https://www.icty.org/x/file/Legal%20Library/jud_supplement/supp32-e/delic.htm (Accessed: 22.02.2026).

16. The Prosecutor v. Duško Tadić. ICTY, Appeals Chamber. Decision on appellant's Motion for the extension of the time-limit and admission of additional evidence, Case No. IT-94-1-A-AR77 [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: <https://www.icty.org/x/cases/tadic/acdec/en/81015EV36285.htm> (Accessed: 22.02.2026).
17. Prosecutor v. Eliezer Niyitegeka. MICT, Appeals Chamber. Decision, Case No. MICT-12-16-R, 13.07.2015 [Online]. Official website of the International Residual Mechanism for Criminal Tribunals. Available at: <https://cld.irmct.org/assets/filings/435-MICT-12-16-0103-1-NIYITEGEKA-DECISION-ON-NIYITEGEKA-S-REQUEST-FOR-REVIEW-AND-ASSIGNMENT-OF-COUNSEL.pdf> (Accessed: 24.02.2026).
18. The Prosecutor v. Veselin Šljivančanin. ICTY, Appeals Chamber. Decision with respect to Veselin Šljivančanin's application for review, Case No. IT-95-13/1-R.1 [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: <https://www.icty.org/x/cases/mrksic/acdec/en/100714.pdf> (Accessed: 24.02.2026).
19. The Prosecutor v. Veselin Šljivančanin. ICTY, Appeals Chamber. Review judgement summary for Veselin Šljivančanin, Case No. IT-95-13/1-R [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: https://www.icty.org/x/cases/mrksic/acjug/en/101208_review_judgement_summary.pdf (Accessed: 24.02.2026).
20. The Prosecutor v. Veselin Šljivančanin. ICTY, Before the Appeals Chamber. Decision with respect to Veselin Šljivančanin's application for review, Case No. IT-95-13/1-R.1 [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: <https://cld.irmct.org/assets/filings/Decision-with-respect-to-Veselin-Sljivancanins-application-for-review.pdf> (Accessed: 22.02.2026).
21. Rome Statute of the International Criminal Court. ICC-PIOS-LT-03-002/15_Eng [Online]. Official website of the International Criminal Court. Available at: <https://www.icc-cpi.int/Publications/Rome-Statute.pdf> (Accessed: 22.02.2026).
22. Schabas, William A. *The International Criminal Court: A Commentary on the Rome Statute* (Oxford Commentaries on International Law). 2nd ed. Oxford: Oxford University Press, 2016, p. 381 (of 1688). ISBN-13: 978-0198739777.
23. Ambos, Kai. "Appeal, Revision, and other Remedies." In: *Treatise on International Criminal Law*, 2016, pp. 548–590, specifically p. 572.
24. The Prosecutor v. Veselin Šljivančanin. ICTY, Appeals Chamber. Scheduling order for hearing regarding Veselin Šljivančanin's application for review, Case No. IT-95-13/1-R.1 [Online]. Official website of the International Criminal Tribunal for the former Yugoslavia. Available at: <https://www.icty.org/x/cases/mrksic/acord/en/100420.pdf> (Accessed: 24.02.2026).
25. Galand, A. S. *Revision of Judgment: International Criminal Courts and Tribunals*, 2021 [Online]. Maastricht University. Available at: https://cris.maastrichtuniversity.nl/ws/portalfiles/portal/109454903/Galand_2021_Revision_of_Judgment.pdf (Accessed: 25.02.2026).
26. Biazatti, Bruno de Oliveira. "Revision of Conviction or Sentence: International Criminal Court (ICC)." In: *Oxford Public International Law*. Oxford: Oxford University Press, 2023 [Online]. Available at: <https://orbi.lu.uni.lu/bitstream/10993/63235/1/Published%20entry%20.pdf> (Accessed: 26.02.2026).
27. Prosecutor v. Augustin Ngirabatware. MICT, Appeals Chamber. Review Judgement, Case No. MICT-12-29-R, 27.09.2019 [Online]. Official website of the International Residual Mechanism for Criminal Tribunals. Available at: <https://ucr.irmct.org/LegalRef/CMSDocStore/Public/English/Judgement/NotIndexable/MICT-12-29-R/JUD284R0000526289.pdf> (Accessed: 26.02.2026).
28. Rules of Procedure and Evidence. ICC-PIOS-LT-03-004/19 [Online]. International Criminal Court, 3–10 September 2002, 99 p. Available at: <https://www.icc-cpi.int/Publications/Rules-of-Procedure-and-Evidence.pdf>; Rome Statute of the International Criminal Court. ICC-PIOS-LT-03-002/15_Eng [Online]. Official website of the International Criminal Court. Available at: <https://www.icc-cpi.int/Publications/Rome-Statute.pdf> (Accessed: 26.02.2026).